

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: MALENA G. CRIPE,	{	CHAPTER 13
	{	
DEBTOR(S)	{	CASE NO. R19-41658-BEM
	{	
	{	JUDGE ELLIS-MONRO

**OBJECTION TO CONFIRMATION**

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.

2. The Debtor(s) has failed to provide the Trustee with a copy of the federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).

3. Schedule I (Income) may fail to accurately reflect new employment with ESR Marketing Alliance since original Schedules filed, in violation of 11 U.S.C. Section 1329 and Bankruptcy Rule 1007.

4. Pursuant to testimony from the Meeting of Creditors, it appears that the Chapter 13 petition no longer references the current mailing address of the Debtor(s).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation of this Debtor's(s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

September 3, 2019

\_\_\_\_\_  
/s  
Albert C. Guthrie, Esq.  
for Chapter 13 Trustee  
GA Bar No. 142399

Mary Ida Townson, Chapter 13 Trustee  
285 Peachtree Center Ave, Suite 1600  
Atlanta, GA 30303  
404-525-1110  
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R19-41658-BEM

**CERTIFICATE OF SERVICE**

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S):

MALENA G. CRIPE  
687 GOSWICK RD  
CHATSWORTH, GA 30705-6211

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

SEAGER & ASSOCIATES

This 3<sup>RD</sup> day of September, 2019

\_\_\_\_\_/s  
Albert C. Guthrie, Esq.  
for Chapter 13 Trustee  
GA Bar No. 142399

Mary Ida Townson, Chapter 13 Trustee  
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